

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Erik A. Ahlgren, in his capacity as assignee
in the assignment for the benefit of
creditors of Ashby Farmers Co-Operative
Elevator Company,

Plaintiff,

v.

Jay Link and Link's Wild Safaris,

Defendants.

Civil No. 19-00305 (JRT/LIB)

**DECLARATION OF JAY E. LINK IN
SUPPORT OF DEFENDANTS'
MOTION TO DISMISS**

I, Jay E. Link, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a named defendant in the case captioned above and make the following statements based upon my personal knowledge.

2. I live and am domiciled in the State of Wisconsin.

3. I understand that Plaintiff brought this action against Defendant Link Wild Safaris, an entity that does not exist and I do not operate. I am the founder and sole member of Link Wild Safaris, LLC, a Wisconsin limited liability company having its principal place of business in Minong, Wisconsin. Link Wild Safaris, LLC acts as a broker between its clients—typically hunters and fishers—and local outfitters around the world. All funds that Link Wild Safaris, LLC receives are paid to the local outfitters who provide Link Wild Safaris, LLC's clients with, among other things, guide services for hunting/fishing, accommodations, meals, beverages, and other services. Link Wild Safaris, LLC receives a commission from the outfitters.

4. I have never maintained a Minnesota bank account or been a Minnesota resident. I have never directly owned a Minnesota business entity, although I was once a shareholder in a Maltese company that was part of a Danish joint venture that was the ultimate parent company of a business that operated in Mankato, Minnesota. My indirect interest in the Mankato-operated business ended several years ago.

5. Link Wild Safaris, LLC has never conducted business in Minnesota, is not licensed to do business in Minnesota, has no agents in Minnesota, does not own property in Minnesota, and does not maintain any Minnesota bank accounts.

6. I have reviewed Plaintiff's Complaint and understand that Plaintiff seeks to void ten checks dated from October 30, 2015 through February 18, 2018. With respect to the 2015 transaction, to the best of my recollection, I first met Jerry Hennessey at the Safari Club International Annual Convention ("SCI Convention"), located in Nevada, in or around February 2015. I, on behalf of Link Wild Safaris, LLC, attended the 2015 SCI Convention to staff Link Wild Safaris, LLC's booth. During the SCI Convention, Mr. Hennessey approached Link Wild Safaris, LLC's booth and requested information regarding Link Wild Safaris, LLC. Mr. Hennessey and I discussed Link Wild Safaris, LLC's services, and Mr. Hennessey informed me that he wished to retain Link Wild Safaris, LLC's services. Mr. Hennessey ultimately traveled to Uganda to hunt with a local outfitter. All services Link Wild Safaris, LLC provided to Mr. Hennessey occurred in Wisconsin.

7. To the best of my recollection, I met Mr. Hennessey again at the 2016 SCI Convention in Nevada. Mr. Hennessey approached Link Wild Safaris, LLC's booth and

advised me that he wished to hunt in Cameroon and retain Link Wild Safaris, LLC's services. Mr. Hennessey traveled to Cameroon to hunt with a local outfitter. All services Link Wild Safaris, LLC provided to Mr. Hennessey occurred in Wisconsin.

8. To the best of my recollection, I met Mr. Hennessey again at the 2017 SCI Convention in Nevada. Mr. Hennessey approached Link Wild Safaris, LLC's booth and advised me that he wished to return to Cameroon to hunt and retain Link Wild Safaris, LLC's services. Mr. Hennessey traveled to Cameroon to hunt with a local outfitter. All services Link Wild Safaris, LLC provided to Mr. Hennessey occurred in Wisconsin.

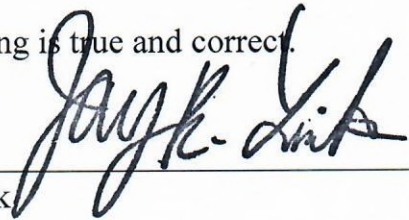
9. To the best of my recollection, I met Mr. Hennessey again at the 2018 SCI Convention in Nevada. Mr. Hennessey approached Link Wild Safaris, LLC's booth and advised me that he wished to hunt in Nepal and retain Link Wild Safaris, LLC's services. Mr. Hennessey traveled to Nepal to hunt with a local outfitter. All services Link Wild Safaris, LLC provided to Mr. Hennessey occurred in Wisconsin.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 27, 2019

s/

Jay E. Link

A handwritten signature in black ink, appearing to read "Jay E. Link", is written over a horizontal line. The signature is stylized and cursive.